

## UNITED STATES DISTRICT COURT

for the  
Western District of Washington

## In the Matter of the Search of

(Briefly describe the property to be searched  
or identify the person by name and address)Information associated with Discord Account  
acowmaybe, display name Oh lol Unique Identifier  
1001677553628627014, more fully described in  
Attachment A.

Case No. MJ25-154

## APPLICATION FOR A SEARCH WARRANT

I, a federal law enforcement officer or an attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that on the following person or property (identify the person or describe the property to be searched and give its location):

Information associated with Discord Account acowmaybe, display name Oh lol Unique Identifier 1001677553628627014, more fully described in Attachment A.

located in the Northern District of California, there is now concealed (identify the person or describe the property to be seized):

See Attachment B, incorporated herein by reference.

The basis for the search under Fed. R. Crim. P. 41(c) is (check one or more):

- ☒ evidence of a crime;  
☒ contraband, fruits of crime, or other items illegally possessed;  
☒ property designed for use, intended for use, or used in committing a crime;  
☐ a person to be arrested or a person who is unlawfully restrained.

The search is related to a violation of:

## Code Section

18 U.S.C. § 2422(b)

18 U.S.C. § 2251(a) and (e), 2252(a)(2)

## Offense Description

Travel with the Intent to Engage in a Sexual Act with a Minor;

Attempted Enticement of a Minor.

The application is based on these facts:

- ☒ See Affidavit of FBI Special Agent Andrew Butler, continued on the attached sheet.

☐ Delayed notice of \_\_\_\_\_ days (give exact ending date if more than 30 days: \_\_\_\_\_) is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.

Pursuant to Fed. R. Crim. P. 4.1, this warrant is presented: ☒ by reliable electronic means; or: ☐ telephonically recorded.

A. Butler

Andrew  
ButlerDigitally signed by  
Andrew Butler  
Date: 2025.03.20  
15:12:14 -07'00'

Applicant's signature

Andrew Butler, Special Agent (FBI)

Printed name and title

- ☐ The foregoing affidavit was sworn to before me and signed in my presence, or  
☒ The above-named agent provided a sworn statement attesting to the truth of the foregoing affidavit by telephone.

Date: 03/21/2025

S. Kate Vaughan

Judge's signature

City and state: Seattle, Washington

S. Kate Vaughan, United States Magistrate Judge

Printed name and title

**AFFIDAVIT OF SPECIAL AGENT ANDREW BUTLER**

STATE OF WASHINGTON )

) ss

COUNTY OF KING )

I, Andrew Butler, a Special Agent with the Federal Bureau of Investigation (FBI),  
Seattle, Washington, having been duly sworn, state as follows:

**INTRODUCTION AND PURPOSE OF AFFIDAVIT**

1. I make this affidavit in support of an application for a search warrant for information associated with certain Discord accounts that are stored at premises owned, maintained, controlled, or operated by Discord, Inc. ("Discord"), a company headquartered in San Francisco, California. The information to be searched is described in the following paragraphs and in Attachment A. This affidavit is made in support of an application for a search warrant under 18 U.S.C. §§ 2703(a), 2703(b)(1)(A) and 2703(c)(1)(A) to require Discord to disclose to the government records and other information in its possession, pertaining to the subscriber or customer associated with the account.

2. I am a Special Agent with the Federal Bureau of Investigation ("FBI") and have been since October 2019. I am currently assigned to the Seattle Field Office in Seattle, Washington and serve on the FBI Seattle Child Exploitation and Human Trafficking Task Force and as a member of the Washington State Internet Crimes Against Children (ICAC) Task Force. As an FBI Special Agent, I investigate criminal violations relating to child exploitation and human trafficking, including violations pertaining to the commercial sexual abuse of minors and adults, and the online sexual exploitation of children involving the transmission, possession and production of child pornography, exploitation of children on the internet, as well as other federal criminal activity and attempts or conspiracies to commit those crimes. I have received specialized

1 training from the FBI Academy consisting of legal classes, criminal procedure,  
2 investigative techniques, evidence preservation and collection, and other law enforcement  
3 training classes. Through my training and experience, I have developed an understanding  
4 of common habits and practices used by those engaged in criminal acts against children  
5 and those who facilitate the commercial sex trafficking of minors and adults. I am  
6 familiar with and have participated in a variety of investigative techniques including but  
7 not limited to surveillance, interviewing of witnesses/suspects, and the execution of  
8 search and seizure warrants, and arrest warrants that involved child exploitation, child  
9 pornography offenses, and/ or commercial sex trafficking offenses.

10 3. The facts in this affidavit come from my personal observations, my training  
11 and experience, and information obtained from other agents and witnesses. This affidavit  
12 is intended to show merely that there is sufficient probable cause for the requested  
13 warrant and does not set forth all of my knowledge about this matter. Based on my  
14 training and experience and the facts as set forth in this affidavit, there is probable cause  
15 to believe that JAMES HARRISON NEWCOMER aka JAKE HARRISON  
16 NEWCOMER has committed the offense charged in this complaint namely, violations of  
17 18 U.S.C. § 2423(b) Travel with the Intent to Engage in a Sexual Act with a Minor, Title  
18 18 U.S.C. § 2422(b) Attempted Enticement of a Minor, violations of Title 18 United  
19 States Code Sections 2251(a) and (e), 2252(a)(2), Production and Receipt of Child  
20 Pornography. There is also probable cause to search the information described in  
21 Attachment A (**Discord Account Discord Username: “acowmaybe,” Display Name:**  
22 **“Oh lol,” Unique Identifier: 1001677553628627014, hereafter SUBJECT**  
23 **ACCOUNT**), for evidence of these crimes and contraband or fruits of these crimes, as  
24 described in Attachment B.

25 //

26 //

27 //

**DEFINITIONS**

The following definitions apply to this affidavit:

4. “Chat,” as used herein, refers to any kind of text communication over the internet that is transmitted in real-time from sender to receiver. Chat messages are generally short in order to enable other participants to respond quickly and in a format that resembles an oral conversation. This feature distinguishes chatting from other text-based online communications such as internet forums and email.

5. For the purposes of this affidavit, a “minor” refers to any person less than eighteen years of age and for the purpose of this search warrant, “Child pornography,” as used herein, is defined in 18 U.S.C. § 2256 (any visual depiction of sexually explicit conduct where (a) the production of the visual depiction involved the use of a minor engaged in sexually explicit conduct, (b) the visual depiction is a digital image, computer image, or computer-generated image that is, or is indistinguishable from, that of a minor engaged in sexually explicit conduct, or (c) the visual depiction has been created, adapted, or modified to appear that an identifiable minor is engaged in sexually explicit conduct).

6. “Sexually explicit conduct” means actual or simulated (a) sexual intercourse, including genital-genital, oral-genital, or oral-anal, whether between persons of the same or opposite sex; (b) bestiality; (c) masturbation; (d) sadistic or masochistic abuse; or (e) lascivious exhibition of the genitals or pubic area of any person. See 18 U.S.C. § 2256(2).

7. “Cloud-based storage service,” as used herein, refers to a publicly accessible, online storage provider that collectors of depictions of minors engaged in sexually explicit conduct can use to store and trade depictions of minors engaged in sexually explicit conduct in larger volumes. Users of such a service can share links and associated passwords to their stored files with other traders or collectors of depictions of minors engaged in sexually explicit conduct in order to grant access to their collections.

1 Such services allow individuals to easily access these files through a wide variety of  
2 electronic devices such as desktop and laptop computers, mobile phones, and tablets,  
3 anywhere and at any time. An individual with the password to a file stored on a cloud-  
4 based service does not need to be a user of the service to access the file. Access is free  
5 and readily available to anyone who has an internet connection.

6 8. “Computer,” as used herein, refers to “an electronic, magnetic, optical,  
7 electrochemical, or other high speed data processing device performing logical or storage  
8 functions, and includes any data storage facility or communications facility directly  
9 related to or operating in conjunction with such device,” including smartphones and  
10 mobile devices.

11 9. “Data,” as used herein refers to the quantities, characters, or symbols on  
12 which operations are performed by a computer, being stored, and transmitted in the form  
13 of electrical signals and recorded on magnetic, optical, or mechanical recording media.

14 10. “Digital Devices” as used herein refers to any physical object that has a  
15 computer, microcomputer, or hardware that is capable of receiving, storing, possessing,  
16 or potentially sending data.

17 11. “Internet Service Providers” (“ISPs”), as used herein, are commercial  
18 organizations, community-owned, non-profit, or otherwise privately-owned companies  
19 that are in business to provide individuals and businesses access to the internet. ISPs  
20 provide a range of functions for their customers including access to the internet, web  
21 hosting, e-mail, remote storage, and co-location of computers and other communications  
22 equipment.

23 12. “Mobile applications,” as used herein, are small, specialized programs  
24 downloaded onto mobile devices that enable users to perform a variety of functions,  
25 including engaging in online chat, reading a book, or playing a game.  
26  
27

1 13. "Records," "documents," and "materials," as used herein, include all  
2 information recorded in any form, visual or aural, and by any means, whether in  
3 handmade, photographic, mechanical, electrical, electronic, or magnetic form.

4 14. "User Attributes," as used herein refers to any tangible data, documents,  
5 settings, programs, or other information that provides information related to the identity  
6 of the specific user of the device, computer, application, program, or record.

7 **INDIVIDUALS WITH A SEXUAL INTEREST IN MINORS**

8 15. Based upon my knowledge, experience, and training concerning child  
9 exploitation investigations, and the training and experience of other law enforcement  
10 officers with whom I have had discussions, I know that there are certain characteristics  
11 common to individuals with a sexual interest in minors who are involved in technology  
12 facilitated crimes against children as described below.

13 16. As described in detail below, NEWCOMER utilized Discord to  
14 communicate with minors in an effort to persuade the minors to meet in person and  
15 engage in sexual activity. Based upon NEWCOMER's 2020 convictions for Rape of a  
16 Child in the Third Degree following his arrest, coupled with his continued efforts to  
17 target minor female victims between the age of 11 - 16 years old on social media  
18 platforms for the purpose of sexual exploitation, and the current investigation into  
19 NEWCOMER's Travel with the Intent to Engage in a Sexual Act with a Minor, there is  
20 ample evidence to confirm NEWCOMER's sexualized interest in minors.

21 17. NEWCOMER is a convicted sex offender who has maintained a sexualized  
22 interest in minors for no less than the past four years. NEWCOMER has continued to  
23 cultivate and groom minor females via online platforms in an effort to entice the minor to  
24 engage in a sexual act. NEWCOMER is using social media accounts capable of internet  
25 connectivity to facilitate these crimes. As described below, based on the forensic  
26 capabilities of computer and smart device examiners, there is probable cause to believe  
27 evidence of NEWCOMER's crimes to include information detailing his travel to and

1 from Oregon and conduct therein will exist in the social media accounts utilized by  
2 NEWCOMER to engage the victim of his crime charged herein (MINOR VICTIM 3).

3 **BACKGROUND CONCERNING DISCORD INC. (Discord)**<sup>1</sup>

4 18. Discord is a messaging platform where millions of users from around the  
5 world connect with each other through chat, voice, and video. We have both a desktop  
6 (PC, Mac, Linux) application and a mobile (iOS, Android) application, and the service  
7 can also be accessed from the website directly at [www.discordapp.com](http://www.discordapp.com).

8 19. In order to use the services, users need to create an account by selecting a  
9 username. Once they've made their account, users can create a server and invite their  
10 friends to join it with an invite link, or they can join an existing server. Servers are  
11 broken down into sub-categories or "channels" where users can connect with each other  
12 by either chatting or calling. Users can also communicate through direct messages, which  
13 are private chats created between 1-10 users.

14 20. Service Provider Records: Subscriber information (often known as  
15 "registration information" for Internet applications or service) is obtained by the service  
16 provider when an account is established and typically includes information such as: The  
17 subscriber name, address, billing/payment information; account initiation date; changes  
18 to the account; type of account; custom account features; additional phone numbers,  
19 email addresses, and/or other contact information; additional persons having authority on  
20 the account; any additional accounts linked to the subject account; and unique identifiers  
21 for the device using the target address, and other devices the customer of the subject  
22 account uses. In my experience, this information frequently provides investigative leads.

23 21. The following is an excerpt from Discord's Law Enforcement Guide  
24 website discussing the types of information they collect:

25 \_\_\_\_\_  
26 <sup>1</sup> The information in this section is based on information published by Discord's "Privacy Policy" website, including,  
27 but not limited to, the following webpages: "Privacy Policy available at <https://values.snap.com/privacy/privacy-policy>, as well as the Discord Law Enforcement Guide.



Content Available Pursuant to a Search Warrant to Discord

Discord stores messages and attachments that users send to each other in text channels, whether it's in a server or in direct messages. These messages and attachments are obtainable through a search warrant. However, Discord does not store the content of voice and video calls. Additionally, if users delete content, that content is immediately deleted and is not retained. Additional non-content information is also available. The following non-content information is available pursuant to a valid subpoena:

1. The unique User ID number of the account that is assigned by Discord
2. Registration date and time for the account
3. Registration IP address of the account
4. Email address provided by the user
5. User's current username and tag number
6. If the user is a paid subscriber, limited billing information
7. IP addresses and session start-timestamps for the last 90 days.

**ORIGINAL SUMMARY OF PROBABLE CAUSE**

**2020 Rape of a Child Third Degree – Two Counts – King County Superior Court**

22. JAKE HARRISON NEWCOMER birth year 1996 was convicted of two counts of Rape of a Child in the Third Degree following his sexual assault of a 15-year-old female victim between July 24, 2020, and July 27, 2020. That investigation revealed that NEWCOMER, then 24 years old, reported to the victim that he was 17 years old when he added the victim on Snapchat, a social medial platform. After interacting with the victim for less than 24 hours, NEWCOMER drove from King County, Washington to Clallam County, Washington and picked the victim up near a bed and breakfast where she was visiting with her family. NEWCOMER drove for approximately five minutes,



1 pulled over the vehicle at an unknown area, and sexually assaulted the victim orally and  
2 vaginally.

3 23. NEWCOMER provided the victim with alcohol and marijuana and drove  
4 the victim to his parent's King County residence where he resided. He snuck the victim  
5 into his parent's home and sexually assaulted her approximately ten times over several  
6 days before she was recovered at his parent's residence by law enforcement on July 27,  
7 2020.

8 24. After serving 30 months in prison, NEWCOMER was under conditions of  
9 Community Custody with the Department of Corrections (hereafter DOC) and was  
10 required to register as a sex offender. Pursuant to the terms of NEWCOMER's  
11 community custody he was required to wear an ankle monitor. On January 19, 2024,  
12 NEWCOMER's ankle monitor died and lost connection. On January 25, 2024,  
13 Washington DOC attempted to arrest NEWCOMER at his residence, but were unable to  
14 locate him. Washington DOC entered an arrest warrant for NEWCOMER following the  
15 ankle monitor battery dying and NEWCOMER's unknown location.

16 25. On June 6, 2024, NEWCOMER was arrested in Kent, Washington by Kent  
17 Police Department. A search incident to arrest was conducted following NEWCOMER's  
18 arrest and a pink/ purple Samsung cellphone, IMEI 353722791432869, SIM card serial  
19 number R5CT44N866L, among other contraband were collected by Kent Police  
20 Department. Kent Police Department transferred custody of the pink/ purple Samsung  
21 cellphone to FBI Seattle on July 8, 2024. NEWCOMER is currently in federal custody  
22 for violations of Title 18, United States Code, Section 2423(b) and 2246(2)(A).

23 **MINOR VICTIM 1: Snoqualmie Police Department – February 2024**

24 26. On or about February 8, 2024, I was contacted by Snoqualmie Police  
25 Department Officer Aguirre about a missing 16-year-old female MINOR VICTIM DOB  
26 2007 (hereinafter MV1). Within several hours of the notification, MV1 returned home. A  
27 subsequent Snoqualmie Police Department investigation discovered that MV1 was

1 picked up at her North Bend residence and provided narcotics by an adult male identified  
2 by Snapchat username “halyc0n.” Specifically, investigators learned that MV1 was added  
3 on Snapchat by halyc0n, who picked up MV1 from her North Bend, Washington  
4 residence at approximately 1:00 a.m. on February 7, 2024, and was driven to an  
5 apartment in the Seattle, Washington where halyc0n provided MV1 methamphetamine. A  
6 toxicology screening was subsequently administered to MV1 and yielded positive result  
7 for methamphetamine. Halyc0n drove MV1 back home on February 8, 2024, at  
8 approximately 8:00am.

9 27. A neighbor observed a black Toyota sedan drop MV1 off in the vicinity of  
10 her residence and attempted to follow the vehicle. The neighbor observed the black  
11 Toyota sedan did not have license plates. MV1’s mother, (hereafter MOTHER1),  
12 reported that she viewed photos, videos, and messages between MV1 and halyc0n which  
13 confirmed sexual intercourse occurred.

14 28. On February 9, 2024, MV1 was forensically interviewed. MV1 disclosed  
15 that she was added on Snapchat by halyc0n and met in person with him the same day.  
16 MV1 described halyc0n as a 28-year-old male and her relationship with him as romantic.  
17 MV1 confirmed she was picked up by halyc0n, whom she called “J” on February 7,  
18 2024, at approximately 0100 PST and was taken to his Seattle apartment where she met  
19 his adult roommate and roommate’s adult girlfriend. “J” instructed MV1 to claim she was  
20 18 years old so she did not become suspicious to the roommates’ adult girlfriend. As  
21 detailed below, investigators subsequently confirmed the identity of Snapchat user  
22 halyc0n as NEWCOMER.

23 **MINOR VICTIM 2: Auburn Police Department – February 2024**

24 29. During the course of the Snoqualmie Police Department investigation, I  
25 learned of a similar Auburn Police Department case involving Snapchat username  
26 “halyc0n.” On February 22, 2024, Auburn Police Department was notified that MINOR  
27 VICTIM 2 DOB 2008 (hereafter MV2 2008) ran away overnight. MV2’s mother

1 (hereafter MOTHER2) reporting having viewed MV2's laptop and observing Snapchat  
2 messages between MV2 and Snapchat username halyc0n. Halyc0n's messages to MV2  
3 detailed how MV2 could disable the security alarm on her window and instructed MV2 to  
4 wait until her parents go to sleep before leaving. Halyc0n reported he would be waiting to  
5 pick MV2 up and expressed plans to get MV2 a fake identification card that reported  
6 MV2 to be 18 years old instead of 15 years old. The Snapchat messages detailed the  
7 intention behind the fake identification card would be to allow MV2 to gain access to  
8 online pornographic websites where videos of sexual contact between MV2 and halyc0n  
9 could be uploaded to make money.

10 30. Described below in relevant part, are two Snapchat communications send  
11 from halyc0n to MV2:

12 a. "You know. Just for the record. I would be more inclined. to take  
13 you away forever. If I knew there would be money coming in. Now obviously I would  
14 never pimp you out sweetpea. you belong to me. and only me. but. There ARE things.  
15 That dont involve you being in any. situation with other real people. That could male  
16 some living money pretty easily. but they are only things I could set up to do with you. If  
17 I had you around all the time. Like we could get on cam together."

18 b. "Get you a fake ides. ID. And we could go be "legal loli porn. on a  
19 cam site. we would rake it in savagely. Because of your size. and because the company  
20 would think you were 18. Because of the fake ID. So if you want to get out sooner.  
21 Perhaps you should think on that. But it cant really be like. Okay Ill do it.and then I take  
22 you. And you puss out at the last second. Cause if that money doesnt come through from  
23 somewhere to pay for you to have what you need. You and I are BOTH fuckdc. fucked.  
24 So if you decide you wouldn't mind fucking on camera with me. Perhaps you could leave  
25 sooner than I thought. Just a thoughtr. thought.\* Cammers make a lot of money. plus by  
26 camming. you open up the ability to sell. if you wish. which is a business that runs itself.  
27

1 lol. Your tiny body is actually worth a lot of money. without even having to touch  
2 anyone. Or actually see them. Something to consider.”

3 31. MV2 disclosed to investigators that she received a Snapchat message from  
4 a user identified as “Aiden” in June 2023. In September 2023, MV2 sent “Aiden” two  
5 fully nude photographs of herself via Snapchat and to visiting “Aiden’s” two-bedroom  
6 apartment in Seattle, where he lived with a roommate. MV2 stayed in one room at the  
7 apartment and the roommate in another. MV2 reported communicating with “Aiden.” I  
8 reviewed the data returned by Snapchat for halyc0n’s account, obtained by a search  
9 warrant executed by Snoqualmie Police Department relating to the investigation  
10 involving MV1. I observed Snapchat user halyc0n was in fact in communication with  
11 MV2 on February 4, 2024. It is unclear if MV2 was protecting halyc0n or failed to  
12 accurately recall his username when speaking with law enforcement.

13 **MINOR VICTIM 3: Woodburn Police Department – April 2024**

14 32. On or about May 15, 2024, I contacted FBI Special Agent Chelsea Barker  
15 about subject Snapchat user “halyc0n”. I learned from Special Agent Barker that a sexual  
16 assault involving a subject Snapchat user “halyc0n” occurred in Woodburn, Oregon.  
17 Woodburn Police Department investigated a report that a 14 year old MINOR VICTIM  
18 DOB 2009 (hereafter MV3), had been sexually assaulted by an adult man in the Salem,  
19 Oregon area. Woodburn Police detectives obtained a search warrant for MV3’s Snapchat  
20 records and observed that MV3 interacted with Snapchat user “halyc0n.” Described  
21 below in relevant part, are Snapchat communications sent from halyc0n to MV3:

22 April 6, 2024, 3:49am “halyc0n” to MV3 via Voice Note: “...We’re hanging out.  
23 We’re fucking. I promise...”

24 April 9, 2024, 3:18am “halyc0n” to MV3 via Voice Note: “I can come right now.  
25 It’s going to be about 2 hours and 15 minutes.”  
26  
27

1 April 10, 2024, 12:09am “halyc0n” to MV3 via Snapchat text: Jpeg image of  
2 screenshot of phone navigation. Depicts vehicle headed south on WA-507 S near  
3 92 AV S and 342<sup>nd</sup> Street S with an ETA of 3:20am.

4 April 10, 2024, 3:43am MV3 to “halyc0n” via Snapchat text: “Are u here”

5 April 10, 2024, 3:46am “halyc0n” to MV3 via Voice Notes: I’m in a Black Toyota  
6 Camry and I’m about to be at the address.

7 33. Woodburn Police Department reviewed Snapchat messages between MV3  
8 and halyc0n on April 12, 2024. In those messages Woodburn Police Department  
9 investigators observed messages by halyc0n, which described having sex with MV3 in  
10 his vehicle. Halyc0n stated he bought privacy screens and mentioned they would have  
11 sex in an area near Walmart. Halyc0n detailed sexual acts he planned to perform on  
12 MV3, which included vaginal, oral and anal sexual penetration. MV3 shared plans of  
13 running away from home with halyc0n, who in turn expressed his willingness to assist  
14 her.

15 34. During a subsequent interview with law enforcement, MV3 disclosed that  
16 on April 10, 2024, a male from Washington identified as “Jack” picked her up. MV3  
17 recalled the male listed his age as 16 years old on his Yubo social media. MV3 described  
18 being sexually assaulted in a Walmart parking lot by “Jack” to include vaginal and anal  
19 penetration. “Jack’s” vehicle did not have license plates because the police were after  
20 him.

21 35. MV3 disclosed that “Jack” picked her up again on April 12, 2024, after she  
22 snuck out of the house. “Jack” drove to a Super 8 Hotel in Woodburn, Oregon where he  
23 sexually assaulted MV3 to include vaginal and oral penetration.

24 36. On May 15, 2024, Snoqualmie Police Department Officer Aguirre sent a  
25 request for information via email to law enforcement officers and prosecutors in the  
26 greater Seattle, Washington area. Included in the request for information were subject  
27 identifiers for Snapchat user halyc0n and photographs of Snapchat user halyc0n.

Photographs of subject halyc0n were obtained following a search warrant return by Snapchat for user halyc0n's data. Also included in Officer Aguirre's request for information were photographs provided by MV1's parents of halyc0n. Photographs included in the request for information email were identified to be NEWCOMER by Washington DOC Community Corrections Officer Bullard, who supervised NEWCOMER following his sex offense convictions. Through interagency coordination between Snoqualmie Police Department, Woodburn Police Department, Washington DOC, and the FBI, Woodburn Police Department identified the male that picked up MV3 on April 10, 2024, and April 12, 2024, was NEWCOMER.

**SUPPLEMENTAL SUMMARY OF PROBABLE CAUSE**

**FOR ADDITIONAL ACCOUNT INVESTIGATING MV4 AND MV5**

**Identification of Discord Username "acowmaybe" - Display name "Oh lol"**

37. Review of two evidence items seized from NEWCOMER identified a Discord account associated to NEWCOMER. The forensic extractions of evidence items 1B7, Black Samsung Tablet (IMEI 359295670397051), and evidence item 1B21, Purple Samsung Cellphone (IMEI 353722791432869), located attribution to show NEWCOMER as the owner of each device. Device attribution included phone number (206) 434-0585 as the number associated to the device, email addresses jakenewco@gmail.com, feylacow@gmail.com, jowens7771@gmail.com, and numerous photos of NEWCOMER taken of himself. Both extractions identified Discord user acowmaybe as a user account of the device.

38. Review of the forensic extractions recovered communication between **Discord username "acowmaybe," display name "Oh lol" Unique Identifier 1001677553628627014 (hereinafter acowmaybe)** and at least two juvenile victims. Discord username acowmaybe is a user account on each of the devices respectively. The forensic extraction did not locate the entirety of the communications, to include text,



1 pictures, videos, or audio messages. Communication between Discord username  
2 acowmaybe and the juvenile victims is further summarized below:

3 **Minor Victim 4: Discord Username “stormcloud2158”**

4 39. Chats located in evidence item 1B7 from Discord user “stormcloud2158,”  
5 display name “Storm,” identified conversations between **April 29, 2024 to May 3, 2024**,  
6 wherein the two usernames discuss meeting in person.

7 4/29/2024 5:54:44 AM(UTC+0), From stormcloud2158: gotta make it so it isn’t  
8 noticeable tho

9 4/29/2024 8:55:06 AM(UTC+0), From stormcloud2158: im surprised I can wqlk  
10 rn tbh

11 4/29/2024 9:07:31 AM(UTC+0), From stormcloud2158: ngl I would’ve cleaned  
12 my room if I knew this would’ve happened tn earlier im so sorry it was a mess tho  
13 (crying emoji)

14 4/29/2024 9:10:21 AM(UTC+0), From stormcloud2158: I thought abt not  
15 suppressing some but then I was so focused on being quiet I didn’t lmao

16 4/29/2024 11:29:29 PM(UTC+0), From Stormcloud2158: surprisingly not, I think  
17 we did it late enough nobody was awake or even knew

18 4/29/2024 11:30:36PM(UTC+0), From Stormcloud2158: I can also prob figure out  
19 how to pop the screen out its easy to figure out and usually nobody drives by past  
20 midnight or at midnight snd I can turn my location off i just dont because last time  
21 i did i got grounded for months lmao

22 4/29/2024 11:32:43PM(UTC+0), From Stormcloud2158: and yes we did make a  
23 fuck ton of noise the other night which i always usually do when I stay up all night  
24 or when I sleep so they prob figured I was jus dead asleep or smth idk as long as  
25 we be more careful not to make any louder or as much sound on accident we  
26 should be good  
27



1 4/30/2024 6:13:10AM (UTC+0), From Stormcloud2158: 20016 Sunnyside Dr N  
2 Shoreline, WA 98133

3 40. Chats located in evidence item 1B21 from Discord user “stormcloud2158,”  
4 display name “Storm,” identified conversations between **May 19, 2024 to May 20, 2024.**

5 41. Review of Google Maps history from evidence item 1B21 located address  
6 XXX NE 195<sup>th</sup> St Shoreline, WA 98155 saved with the title, “Bunny,” recorded at  
7 4/30/2024 10:44:23 PM (UTC-7). A screen capture was located that depicted the phone’s  
8 user navigating to XXX NE 195<sup>th</sup> St Shoreline, WA. The screen capture depicted the  
9 phone’s user approximately 450 feet from XXX NE 195<sup>th</sup> St Shoreline, WA and was  
10 recorded 5/1/2024 5:30:41 PM (UTC-7). The investigation identified that NEWCOMER  
11 would call minor victims the nickname “bunny” when communicating with the children.

12 42. Special Agent Butler identified that XXX NE 195<sup>th</sup> St Shoreline, WA  
13 98155 was a previous address of MOTHER OF MINOR VICTIM 4 (hereafter MV4).  
14 Special Agent Butler learned that MOTHER OF MV4 had a juvenile daughter, identified  
15 as MINOR VICTIM 4 DOB 2009. SA Butler recognized MV4’s name from an evidence  
16 item recovered by Kent Police Department. While executing a search warrant on the  
17 black Toyota Camry registered to NEWCOMER, Kent Police Department recovered and  
18 seized a Venmo card with MV4’s name on the card.

19 43. SA Butler served an administrative subpoena to Discord for the subscriber  
20 information associated to username stormcloud2158. The subscriber information reported  
21 that phone number (385)XXX-6340 was registered to the account. A query of a law  
22 enforcement database identified King County Sheriff’s Office report C24015169, which  
23 named MOTHER OF MV4 and MV4. King County Sheriff’s Office report C24015169  
24 listed phone number (385)XXX-6340 as associated to MV4.

25 **Minor Victim 5: Discord Username “foreskin\_robber”**

26 44. Chats located in evidence item 1B7 from Discord user “foreskin\_robber,”  
27 display name “foreskin\_robber,” (hereinafter foreskin\_robber) identified conversations

1 between **April 25, 2024 to May 1, 2024**, with Discord user acowmaybe, display name  
2 Oh lol.

3 4/28/2024 9:26:38 PM (UTC+0), From Oh lol: I just miss holding your little hands

4 4/28/2024 9:27:00 PM (UTC+0), From Oh lol: and even though its sketchy, I miss  
5 those moments when I was nervous about walking you into the motel

6 4/28/2024 9:27:11 PM (UTC+0), From Oh lol: because you are literally so god  
7 damn fucking cute

8 4/29/2024 4:15:49 AM (UTC+0), From Oh lol: I recommend we continue as we  
9 did before minus the broken condom

10 4/29/2024 4:16:17 AM (UTC+0), From Oh lol: and enjoy it while we can because  
11 I definitely will not have money for more than 2 nights with a motel room lol

12 45. Chats located in evidence item 1B21 from Discord user “foreskin\_robber,”  
13 display name “foreskin\_robber,” (hereinafter foreskin\_robber) identified conversations  
14 between **May 1, 2024 to May 10, 2024** with Discord user acowmaybe, display name Oh  
15 lol.

16 5/10/2024 8:26:27 AM(UTC-7), From Oh lol: Finally fixed my car

17 5/10/2024 8:26:58 AM(UTC-7), From Oh lol: Except literally it cost me every  
18 single dollar that I had...(emoji)...and then some, actually

19 5/10/2024 8:27:11 AM(UTC-7), From foreskin\_robber: oh cool, umm I don’t  
20 think I really want to do anything anymore I’m so sorry

21 46. Location history in both evidence item 1B7 and 1B21 show a navigation  
22 route from 1737 Belmont Ave Seattle, WA 98122 to XXXX W Bridge Ave, Spokane,  
23 WA 99201 on 3/22/24. 1737 Belmont Ave, Apartment 10, Seattle, WA 98122 was  
24 NEWCOMER’s residential address on file with the Washington Department of  
25 Licensing, as well as NEWCOMER’s residential address recorded with the Washington  
26 Department of Corrections. A query of individuals associated to XXXX W Bridge Ave,  
27 Spokane, WA 99201 identified MINOR VICTIM 5 DOB 2008, whose Washington

1 Department of Licensing photograph was consistent with photographs of  
2 foreskin\_robber.

3 47. Web history on item 1B7 located booking history for a Motel 6-Spokane,  
4 WA – Downtown, with a check-in date of 3/22/2024 and a check out date of 3/23/2024.

5 48. Because this Application is submitted for the limited purpose of  
6 establishing probable cause in support of the application for a search warrant, it does not  
7 set forth each and every fact I or others have learned during the course of this  
8 investigation. I have set forth only the facts I believe are relevant to the determination of  
9 probable cause to believe evidence, fruits, and instrumentalities of violations of 18 U.S.C.  
10 § 2423(b) Travel with the Intent to Engage in a Sexual Act with a Minor and Title 18  
11 U.S.C. § 2422(b) Attempted Enticement of a Minor be found in or within the SUBJECT  
12 ACCOUNT.

13 **INFORMATION TO BE SEARCHED AND THINGS TO BE SEIZED**

14 49. I anticipate executing this warrant under the Electronic Communications  
15 Privacy Act, in particular 18 U.S.C. §§ 2703(a), 2703(b)(1)(A) and 2703(c)(1)(A), by  
16 using the warrant to require Discord to disclose to the government copies of the records  
17 and other information (including the content of communications) particularly described in  
18 Section I of Attachment B. Upon receipt of the information described in Section I of  
19 Attachment B, government-authorized persons will review that information to locate the  
20 items described in Section II of Attachment B.

21 **CONCLUSION**

22 50. Pursuant to 18 U.S.C. § 2703(g), the presence of a law enforcement officer  
23 is not required for the service or execution of this warrant. The government will execute  
24 this warrant by serving it on Discord. Because the warrant will be served on Discord,  
25 who will then compile the requested records at a time convenient to it, reasonable cause  
26 exists to permit the execution of the requested warrant at any time in the day or night.

51. This Court has jurisdiction to issue the requested warrant because it is “a court of competent jurisdiction” as defined by 18 U.S.C. § 2711. 18 U.S.C. §§ 2703(a), (b)(1)(A) & (c)(1)(A). Specifically, the Court is “a district court of the United States . . . that – has jurisdiction over the offense being investigated.” 18 U.S.C. § 2711(3)(A)(i).

52. The affidavit and application are being presented by reliable electronic means pursuant to Federal Rules of Criminal Procedure 4.1 and 41(d)(3).

53. Based on the information set forth herein, there is probable cause to search the above-described SUBJECT SOCIAL MEDIA ACCOUNT between March 22, 2024 to May 10, 2024, as further described in Attachment A, for evidence, fruits, and instrumentalities, of violations 18 U.S.C. § 2423(b) Travel with the Intent to Engage in a Sexual Act with a Minor, Title 18 U.S.C. § 2422(b) Attempted Enticement of a Minor, violations of Title 18 United States Code Sections 2251(a) and (e), 2252(a)(2), Production and Receipt of Child Pornography as further described in Attachment B.

*A. Butler* Andrew Butler  
Digitally signed by Andrew Butler  
Date: 2025.03.20  
15:11:49 -07'00'

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ANDREW BUTLER  
Special Agent  
Federal Bureau of Investigation

The above-named agent provided a sworn statement attesting to the truth of the foregoing affidavit by telephone on this 21st day of March, 2025.

*S. Kate Vaughan*  


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THE HON. S. Kate Vaughan  
United States Magistrate Judge

**ATTACHMENT A**

**Property to Be Searched**

This warrant applies to information associated with **Discord Account**  
**acowmaybe, display name Oh lol Unique Identifier 1001677553628627014** that is  
stored at premises owned, maintained, controlled, or operated by Discord, Inc, a company  
headquartered in San Francisco, California.

**ATTACHMENT B****Particular Things to be Seized****I. Information to be disclosed by Discord**

To the extent that the information described in Attachment A “acowmaybe,”  
**Display Name: “Oh lol,” Unique Identifier 1001677553628627014** is within the  
 possession, custody, or control of Discord, regardless of whether such information is  
 located within or outside of the United States, including any messages, records, files,  
 logs, or information that have been deleted but are still available to Discord, or have been  
 preserved pursuant to a request made under 18 U.S.C. § 2703(f), Discord is required to  
 disclose the following information to the government for the user listed in Attachment A  
 for the dates March 22, 2024 – May 10, 2024.

to the date of compliance with this warrant/order:

a. Subscriber basic contact information including subscriber, name, birth date, email address(es), physical address (city, state, zip, country), all telephone numbers, screen name and any associated website;

b. Basic subscriber information (BSI) including Subscriber Identification Number, Date and Time stamp of account creation date displayed in GMT, IP address at account sign-up, Logs in GMT showing source and destination IP addresses and ports; most recent Logins in GMT, registered mobile number(s), verification on whether publicly viewable, and all advertising identification number(s), as well as all devices used to access the account, including IMEI numbers, ICCID numbers, all descriptions of make and model, push-tokens, any additional associated accounts;

c. Customer service records: All subscriber contacts with customer support including notifications or complaints of the account being hacked or stolen, or any other issue with the use of or access to the Discord account that were created, uploaded, adjusted, accessed, used, modified, or deleted;

d. Subscriber financial account information and account status history

1 e. Images: All photos, videos, and other depictions associated with the  
2 account, in any format or media. Law enforcement will search these files and only seize  
3 child pornography defined in 18 U.S.C. § 2256, in addition to all depictions which  
4 demonstrate dominion and control over the account;

5 f. Postings, communications, biographical information, or other  
6 information identifying the suspect account user and/or any other persons transmitting  
7 depictions of minors engaged in sexually explicit conduct or evidencing the transmissions  
8 thereof;

9 g. Usage information detailing how the suspect account interacted with  
10 Discord including filters used to apply to Snaps, which Stories the suspect account  
11 watched on Discover, whether the suspect account used Spectacles, or which search  
12 queries the suspect account user submit;

13 h. Usage information detailing how the suspect account communicated  
14 with other Discord users, such as their names, the time and date of your communications,  
15 the number of messages exchanged with other users, which other users exchanged  
16 messages with the suspect account, and the suspect account's interactions with messages  
17 (such as when the suspect account opened a message or captured a screenshot);

18 i. Content information including information about the content created  
19 or provided by the suspect account, such as if the recipient has viewed the content and the  
20 metadata that is provided with the content;

21 j. Device information documenting the devices used by the suspect  
22 account to include information about the suspect account's hardware and software (to  
23 include hardware model, operating system version, device memory, advertising  
24 identifiers, unique application identifiers, apps installed, unique device identifiers,  
25 browser type, language, battery level, and time zone);

26 k. Device information documenting device sensors, such as  
27 accelerometers, gyroscopes, compasses, microphones, and whether the suspect account  
has headphones connected;

l. Device information documenting the wireless and mobile network  
connections, to include mobile phone number, service provider, IP address, and signal  
strength;

m. Device information to include device Phonebook data collected, and  
any unique identifiers for devices used to access the account;

n. Device information to include Camera and Photos collected from the  
suspect account's device's camera and photos;



1           o.       Location information about the suspect account's precise location  
2 using methods that include GPS, wireless networks, cell towers, Wi-Fi access points, and  
3 other sensors, such as gyroscopes, accelerometers, and compasses;

4           p.       Information collected by cookies and other technologies to include  
5 information when the suspect account interacted with services Discord offers through one  
6 of its partners, such as advertising and commerce features;

7           q.       Log information such as:

8                   i.       details about how the suspect account used Discord services;

9                   ii.      device information, such as the suspect account's web  
10 browser type and language;

11                  iii.     access times;

12                  iv.     pages viewed;

13                  v.      IP address;

14                  vi.     identifiers associated with cookies or other technologies that  
15 may uniquely identify the suspect account's device or browser; and

16                  vii.    pages the suspect account visited before or after navigating to  
17 Discord's website.

18           r.       Information collected from Third Parties about the suspect account  
19 from other users, Discord affiliates, and third parties to include if the suspect account  
20 linked its Discord account to another service (like Bitmoji or a third-party app) or if  
21 another user uploads their contact list, Discord may combine information from that user's  
22 contact list with other information Discord have collected about the suspect account.

23           Discord is hereby ordered to disclose the above information to the government  
24 within **14 days** of issuance of this warrant.

## 25   **II.   Information to be seized by the government**

26           All information described above in Section I that constitutes fruits, evidence and  
27 instrumentalities of violations of 18 U.S.C. § 2423(b) Travel with the Intent to Engage in  
a Sexual Act with a Minor, Title 18 U.S.C. § 2422(b) Attempted Enticement of a Minor,

1 violations of Title 18 United States Code Sections 2251(a) and (e), 2252(a)(2),  
2 Production and Receipt of Child Pornography, involving A **“acowmaybe,” Display**  
3 **Name: “Oh lol,” Unique Identifier 1001677553628627014** since the creation of the  
4 account, including, for each user ID identified on Attachment A, information pertaining  
5 to the following matters:  
6

7 a. Evidence identifying the person(s) exercising dominion and control  
8 over the suspect account;

9 b. Financial account information and account status history;

10 c. Evidence indicating the targeting, communication, and solicitation of  
11 minors to engage in sexually explicit conduct, produce sexually explicit material, and  
12 distribution of such files at the direction of others;

13 d. All photos, videos, and other depictions associated with the account  
14 that depict child pornography defined in 18 U.S.C. § 2256;

15 e. Images associated with the account belonging to the Discord suspect  
16 account user;

17 f. Postings, communications, biographical information, or other  
18 information identifying the suspect account user and/or any other persons transmitting  
19 depictions of minors engaged in sexually explicit conduct, and attempts thereof, or  
20 evidencing the transmissions thereof;

21 g. Usage information evidence and communications between others to  
22 include communications to target minors for sexual extortion or exploitation (including  
when the suspect account opened a message or captured a screenshot);

23 h. Evidence of payment for receipt of child sexual abuse material;

24 i. Evidence indicating how and when the Discord account was  
25 accessed or used, to determine the chronological and geographic context of account  
26 access, use, and events relating to the crime under investigation and to the Discord  
27 account owner;

1           j.       Information about the content created or provided by the suspect  
2 account, when the content was viewed and the metadata that is provided with the content;

3           k.       Data related to linked services;

4           l.       User attribution evidence identifying the account user's devices,  
5 software, sensors, operating version, advertising identifiers, installed applications, unique  
6 identifiers, browser data, time zone, wireless and mobile network connections to include  
7 numbers, providers, IP addresses, and data related thereto;

8           m.       Evidence of the Discord account user's state of mind as it relates to  
9 the crimes under investigation;

10          n.       The identity of the person(s) who created or used the user ID,  
11 including records that help reveal the whereabouts of such person(s), and to establish  
12 dominion and control over the account during this time period.

13 This warrant authorizes a review of electronically stored information, communications,  
14 other records and information disclosed pursuant to this warrant in order to locate  
15 evidence, fruits, and instrumentalities described in this warrant. The review of this  
16 electronic data may be conducted by any government personnel assisting in the  
17 investigation, who may include, in addition to law enforcement officers and agents,  
18 attorneys for the government, attorney support staff, and technical experts. Pursuant to  
19 this warrant, the FBI may deliver a complete copy of the disclosed electronic data to the  
20 custody and control of attorneys for the government and their support staff for their  
21 independent review.  
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